

OFFICE OF DIRECTOR
RALPH VAUGHT, *Director*
CHARLES GROOMS, *Deputy Director*
Phone 365-9222

Phone 363-9222
RECEIVED

JUL 1 1994

FCC MAIL ROOM

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

Dear Chairman Hundt:

We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls.

We have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers.

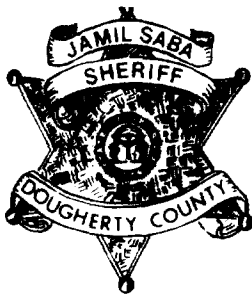
Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts.

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions--decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,

~~Name/Title~~

No. of Copies rec'd
List ABCDE



RECEIVED

JUL 1 1994

FCC MAIL ROOM



Office of the Sheriff

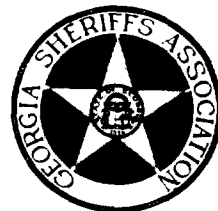
Dougherty County, Georgia

Jamil Saba, Sheriff

P.O. Box 1827, Albany, Georgia 31703

Telephone (912) 436-1561

GA 0470000



DOCKET FILE COPY ORIGINAL

July 25, 1994

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

Re: CC Docket No. 92-77 Opposition to Billed Party Preference

Dear Mr. Hundt:

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trained to handle inmate calls.

The Billed Party Preference will do nothing more than undermine our ability to control all inmates in our facility. If you approve BPP, you will take away all established tools incorporated in the phone system to accomplish the below listed issues:

- A) Victim and witness harassment prevention by inmates;
- B) Facility personnel supervision of phone usage;
- C) Phone number blocking capability;
- D) Call duration capability;
- E) Call monitoring and recording capabilities;
- F) Inmate phone commissions;
- G) Collect-only system capability; and
- H) Reduced budgetary costs due to not having to pay for inmate calls.

No. of Copies rec'd _____
List ABCDE _____

0

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions--decisions that are clearly within our discretion and which we have a public responsibility to make.

Yours for better Law Enforcement,

A handwritten signature in black ink, appearing to read "Jamil Saba". The signature is fluid and cursive, with the first name "Jamil" and last name "Saba" clearly distinguishable.

Jamil Saba, Sheriff
Deugherty County Sheriff's Office
225 Pine Avenue
Albany, Georgia 31702

cc: Vice President Al Gore
Senator Paul Coverdell
Senator Sam Nunn
Congressman Sanford Bishop



FRANK MCGUIRT DOCKET FILE COPY OF

SHERIFF OF UNION COUNTY

P.O. BOX 1110 MONROE, N.C. 28111-1110

TELEPHONES

EMERGENCY DISPATCH 704-289-1591

NON EMERGENCY 704-283-3789



July 26TH, 1994

The Honorable Reed E. Hundt
Federal Communications Commission
1919 M Street, NW
Washington, D.C.

RECEIVED

JUL 1 1994

FCC MAIL ROOM

Re: CC Docket No. 92-77 Opposition to Billed Party Preference

Dear Chairman Hundt:

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

After reviewing the security and administration needs at the Union County Jail, we have determined that it is a necessity to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls. We have recently moved to a new facility with the latest technology in place. We have four phones in each housing area that are designed to withstand heavy usage and rough treatment which is necessary in a jail environment. Our phone system is tied into a network which allows the inmates and jail staff to benefit from certain privileges that would not be guaranteed with the BPP system.

Inmates under our current system have access to the phones between the hours of 8:00 AM and 10:00 PM seven days a week. These phones operate with little maintenance and added security. Phone calls are billed to the receiving party at a nominal fee. We have received no complaints from the inmates of the Union County Jail or receiving parties in regards to the cost or convenience of this system. Therefore from the inmate point of view there is no need of changing the current system.

From the administrative perspective, there is definitely no need for change. The current system has several advantages worth your consideration. We have the capability of placing blocks on phone numbers outside our facility as requested by receiving parties. This eliminates telephone harassment by inmates and prevents them from contacting victims, witnesses, law enforcement officers, judges, attorneys, and other officials involved in their cases. We receive revenue from our phone carrier that off-sets the taxpayers money used to maintain and staff the jail. This money goes into the count's general fund balance.

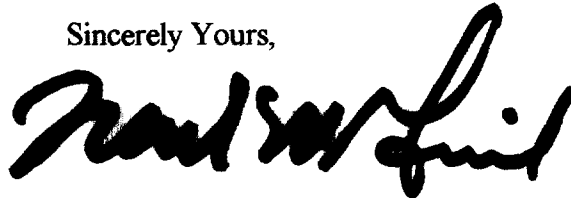
In essence, BPP would eliminate our control over inmate phone calls and subject the general public to constant harassment and unwanted phone calls from our facility. Inmates would not have frequent access to phones and they would be limited to using a phone to

No. of Copies rec'd _____
List ABCDE

- Page Two -

once or twice a week, and the county's revenue could be eliminated. Therefore we believe it would be in the best interests of all parties involved to leave the current inmate phone billing system in place.

Sincerely Yours,

A handwritten signature in black ink, appearing to read "Frank McGuirt". The signature is stylized with a large, sweeping initial "F" and a long, horizontal stroke extending to the right.

Frank McGuirt, Sheriff
Union County, NC

DOCKETED COPY ORIGINAL

RECEIVED

JUL 1 1994

FCC MAIL ROOM

July 20, 1994

The Honorable Reed Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D. C. 20554

Re: CC Docket #92-77

Dear Chairman Hundt:

I am writing to voice my concerns about the proposed Billed Party Preference regulation. The correctional facility inmate phone industry would be severely jeopardized by BPP, affecting inmates, their families and the criminal justice system as a whole. *For this reason, we are asking that inmate calls be exempt from the proposed BPP regulation.*

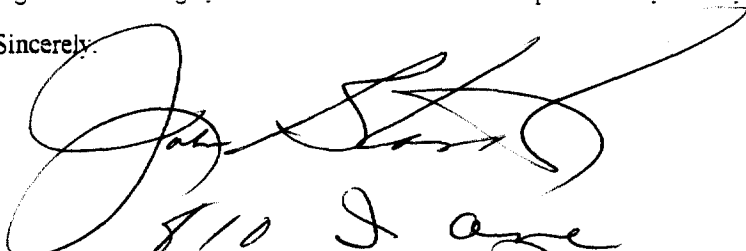
Over the past ten years, administrators of correctional facilities have been able to put into place a very effective system for allowing inmate phone calls. The right to choose our phone service provider has been key to our success. This service has always been delivered to us at very reasonable rates. What's more, inmate phone commissions have been a significant source of revenue for our facility and have helped us improve it dramatically. *We use this revenue to fund various programs including: law enforcement education; inmate health, education and recreation; jail personnel safety; drug prevention and other community programs; family visitation etc.*

Here are a few of my biggest concerns about Billed Party Preference:

- It strips correctional facility administrators of the right to choose inmate phone providers.
- Technology for BPP would reportedly cost upwards of \$1.5 billion, an expense that would have to be passed along to the consumer.
- Without the authority to process calls, inmate phone providers would no longer have the revenue to provide the sophisticated phone systems used in prisons. The end result: fewer phones with fewer security features. Facilities would have to revert to the old ways of supervising each and every inmate call.
- The average length of stay in jail would increase because inmates would not have the phone privileges required to make arrangements for obtaining bond. *This costs everyone!*
- Under BPP, correctional facilities would no longer have control over inmate calls, which means no call tracking or blocking. Inmates could conceivably harass judges, witnesses, jury members or even the victims of their crimes.
- Without call control, facilities would be unable to control fraud problems currently handled by inmate phone providers.

For the above reasons, and countless others, we believe that THE COSTS OF BILLED PARTY PREFERENCE FOR INMATE CALLS FAR OUTWEIGH THE BENEFITS. If BPP does become regulation, we urge you to make inmate calls exempt. Thank you for your consideration of my views.

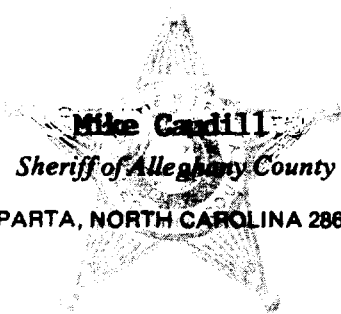
Sincerely,


Jay L. Saxe
Nevada State Prison
5020,

No. of Copies rec'd 0
List ABCDE

*Retired Sheriff
343 yrs.*

Post Office
Box 53


Mike Cardill
Sheriff of Allegheny County
SPARTA, NORTH CAROLINA 28675

DOCKET FILE COPY ORIGINAL

Telephone:
(919) 372-4455

July 25, 1994

RECEIVED

JUL 1 1994

FCC MAIL ROOM

The Honorable Reed E. Hundt
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: Billed Party Preference; CC Docket No. 92-77

Dear Chairman Hundt,

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We know the security needs at our facility and realize the necessity of a single carrier phone service provider. We feel strongly that inmates should not have open access to the telecommunications network or the freedom to use any carrier they please. If BPP is enacted, we no longer will have the right to coordinate inmate calls through a carrier we know and trust. As a result, there will be no call and fraud controls and our effectiveness in law enforcement and our security will certainly be threatened.

Phone equipment specifically designed for inmate calls is an absolute must in our estimation. This equipment helps to protect the public by preventing abusive calls, fraud and other criminal activity over the telephone network. Furthermore, we truly could not afford to provide this equipment without the help of inmate phone service providers. The revenue sharing arrangements that we have with our inmate phone service provider has proved to be an effective means of financing not only the phone system itself but also programs that are beneficial to the inmates. It is for these financial and security reasons that we strongly oppose any federal intervention in our ability to manage and control inmates' calling.


In summary, BPP would undermine our ability to enforce certain security measures that we feel are imperative at our facility, will increase expenses and will reduce the services available

No. of Copies rec'd 0
List ABCDE

The Honorable Reed E. Hundt
Page 2
July 25, 1994

to inmates. We implore you not to adopt regulations that will interfere with the security and operation of our correctional facility and further reduce our ability to provide for the public's safety.

Respectfully Submitted,


Mike Caudill, Sheriff
Alleghany County Jail
P.O. Box 53
Sparta, N.C. 28675

MC/dgm

cc: The Honorable James H. Quello
The Honorable Rachelle B. Chong
The Honorable Andrew C. Barrett
The Honorable Susan Ness

DO NOT DESTROY ORIGINAL

RECEIVED

JUL 1 1994

FCC MAIL ROOM

July 20, 1994

The Honorable Dale Bumpers
United States Senate
Dirksen Bldg., Room 229
Washington, D. C. 20510

Re: CC Docket #92-77

Dear Senator:

I am writing to voice my concerns about the proposed Billed Party Preference regulation. The correctional facility inmate phone industry would be severely jeopardized by BPP, affecting inmates, their families and the criminal justice system as a whole. *For this reason, we are asking that inmate calls be exempt from the proposed BPP regulation.*

Over the past ten years, administrators of correctional facilities have been able to put into place a very effective system for allowing inmate phone calls. The right to choose our phone service provider has been key to our success. This service has always been delivered to us at very reasonable rates. What's more, inmate phone commissions have been a significant source of revenue for our facility and have helped us improve it dramatically. *We use this revenue to fund various programs including: law enforcement education; inmate health, education and recreation; jail personnel safety; drug prevention and other community programs; family visitation etc.*

Here are a few of my biggest concerns about Billed Party Preference:

- It strips correctional facility administrators of the right to choose inmate phone providers.
- Technology for BPP would reportedly cost upwards of \$1.5 billion, an expense that would have to be passed along to the consumer.
- Without the authority to process calls, inmate phone providers would no longer have the revenue to provide the sophisticated phone systems used in prisons. The end result: fewer phones with fewer security features. Facilities would have to revert to the old ways of supervising each and every inmate call.
- The average length of stay in jail would increase because inmates would not have the phone privileges required to make arrangements for obtaining bond. *This costs everyone!*
- Under BPP, correctional facilities would no longer have control over inmate calls, which means no call tracking or blocking. Inmates could conceivably harass judges, witnesses, jury members or even the victims of their crimes.
- Without call control, facilities would be unable to control fraud problems currently handled by inmate phone providers.

For the above reasons, and countless others, we believe that THE COSTS OF BILLED PARTY PREFERENCE FOR INMATE CALLS FAR OUTWEIGH THE BENEFITS. If BPP does become regulation, we urge you to make inmate calls exempt. Thank you for your consideration of my views.

Sincerely,

Jeff. L. Cole

No. of Copies rec'd
List ABCDE

0

BUCHANAN COUNTY SHERIFF'S DEPARTMENT

PUBLIC SAFETY CENTER
INDEPENDENCE, IOWA 50644

DOCKET FILE COPY ORIGINAL

LEONARD R. DAVIS, Sheriff
Capt. JACK L. STRAW, Chief Deputy

Administrative (319) 334-2568
Emergency (319) 334-2567
FAX (319) 334-6542

RECEIVED

JUL 1 1994

FCC MAIL ROOM

July 27, 1994

The Honorable Reed Hundt, Chairman
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Re: CC Docket #92-77

Dear Chairman Hundt

This letter to you is regarding my curiosity of the proposed Billed Party Preference (BPP) regulation. The correctional facility phone industry would be severely jeopardized by BPP, affecting inmates, law enforcement and the criminal justice system as a whole. For this reason, we are asking that inmates be exempt from the proposed BPP regulation.

Over the past several years has happened with inmate phone service, including the commercialization of inmate phone service. It has been a significant source of revenue for our facility and has helped us improve financially. We use these funds to fund various programs including: law enforcement training, inmate health, education and recreation, jail personnel safety, drug prevention and other correctional programs; family visitation etc.

Here are a few of the reasons why inmates should not have Billed Party Preference

- Correctional facilities would not have the right to choose an inmate phone service provider.
- The ability to control all inmate calls, and track or block calls would be eliminated. Inmates could conceivably harass judges, witnesses, jury members or even the victims of their crimes.
- The average length of stay in jail would increase due to the fact that inmates would not have the phone privileges required to make arrangement in obtaining bond. This costs everyone!
- Cost of inmate calls would increase due to the expensive features required to control the fraud that is now controlled by our phone provider.
- Without the authority to process calls, inmate phone providers

No. of Copies rec'd
List ABCDE

0

would no longer have the revenue to provide the sophisticated phone systems used in prisons. The end result: fewer phones with fewer security features. Facilities would have to revert to the old ways of supervising each and every inmate call.

For the above points of interest and several other reasons, we believe THE COSTS OF BILLED PARTY PREFERENCE FOR INMATE CALLS FAR OUTWEIGH THE BENEFITS. If BPP does become regulation, we urge you to make inmate calls exempt. Thank-you for your time and consideration in this matter.

Sincerely,

A handwritten signature in cursive script, reading "Leonard R. Davis".

Leonard R. Davis, Sheriff
Buchanan County

LRD/pjf

RECEIVED

JUL 1 1994

FCC MAIL ROOM

July 20, 1994

The Honorable Reed Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D. C. 20554

Re: CC Docket #92-77

Dear Chairman Hundt:

I am writing to voice my concerns about the proposed Billed Party Preference regulation. The correctional facility inmate phone industry would be severely jeopardized by BPP, affecting inmates, their families and the criminal justice system as a whole. *For this reason, we are asking that inmate calls be exempt from the proposed BPP regulation.*

Over the past ten years, administrators of correctional facilities have been able to put into place a very effective system for allowing inmate phone calls. The right to choose our phone service provider has been key to our success. This service has always been delivered to us at very reasonable rates. What's more, inmate phone commissions have been a significant source of revenue for our facility and have helped us improve it dramatically. *We use this revenue to fund various programs including: law enforcement education; inmate health, education and recreation; jail personnel safety; drug prevention and other community programs; family visitation etc.*

Here are a few of my biggest concerns about Billed Party Preference:

- It strips correctional facility administrators of the right to choose inmate phone providers.
- Technology for BPP would reportedly cost upwards of \$1.5 billion, an expense that would have to be passed along to the consumer.
- Without the authority to process calls, inmate phone providers would no longer have the revenue to provide the sophisticated phone systems used in prisons. The end result: fewer phones with fewer security features. Facilities would have to revert to the old ways of supervising each and every inmate call.
- The average length of stay in jail would increase because inmates would not have the phone privileges required to make arrangements for obtaining bond. *This costs everyone!*
- Under BPP, correctional facilities would no longer have control over inmate calls, which means no call tracking or blocking. Inmates could conceivably harass judges, witnesses, jury members or even the victims of their crimes.
- Without call control, facilities would be unable to control fraud problems currently handled by inmate phone providers.

For the above reasons, and countless others, we believe that THE COSTS OF BILLED PARTY PREFERENCE FOR INMATE CALLS FAR OUTWEIGH THE BENEFITS. If BPP does become regulation, we urge you to make inmate calls exempt. Thank you for your consideration of my views.

Sincerely,

H. J. Ebel Sheriff Louisa Co. Iowa

No. of Copies rec'd 0
List ABCDE